

Morton G. Rosen (mrosen@hbblaw.com) (Bar No. 34333)  
 Chandra Moore (cmoore@hbblaw.com) (Bar No. 202806)  
 HAIGHT, BROWN & BONESTEEL, L.L.P.  
 6080 Center Drive, Suite 800  
 Los Angeles, CA 90045-1574  
 Telephone: (310) 215-7100  
 Facsimile: (310) 215-7300

Attorneys for Defendants SONNY J. JOSLIN, ERIC  
 JAMES TINGEY, and DECOR A DOOR &  
 WINDOW, INC.

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA

MASTERPIECE LEADED WINDOWS  
 CORPORATION,

Plaintiff,

vs.

SONNY J. JOSLIN, an individual, ERIC  
 JAMES TINGEY, an individual, DECOR  
 A DOOR & WINDOW, INC.,

Defendants.

Case No. 08 CV 765 JM/JMA

**DEFENDANTS' INITIAL  
 DISCLOSURES PURSUANT TO RULE  
 26(a)(1)**

Defendants SONNY J. JOSLIN ("Joslin"), ERIC JAMES TINGEY ("Tingey"), and  
 DÉCOR A DOOR & WINDOW, INC. ("Décor"), hereby make their Initial Disclosure in  
 accordance with Rule 26(a)(1).

**GENERAL PREFACE APPLICABLE TO ALL SECTIONS**

Discovery has just begun and as such, Defendants have not yet fully completed their  
 investigation of the facts, have not yet interviewed all witnesses, have not participated in  
 written discovery or taken depositions. Defendants responses contained herein are based  
 solely upon information currently available to and specifically known by Defendants.  
 Further discovery, independent investigation, legal research and analysis may supply  
 additional facts and documents and may lead to additions, changes and/or variations from  
 the responses contained herein.

1 The Complaint is vague, ambiguous and conclusory, and at present, Defendants do  
 2 not know what, if anything, is material and relevant in terms of disproving Plaintiff's  
 3 claims and proving Defendants' defenses. Accordingly, Defendants reserve their right to  
 4 amend or supplement its initial disclosures at a later date.

5 The above is incorporated by reference into every other section of this Initial  
 6 Disclosure.

### 7 WITNESSES

8 Joslin, Tingey, Joel Debus anyone who is designated by Plaintiff and its counsel as  
 9 the persons most knowledgeable with regard to facts, and those that have custody,  
 10 possession and control of documents that Plaintiff and its counsel believe explain and  
 11 support Plaintiff's allegations. Additionally, there will be percipient witnesses identified  
 12 through discovery and expert witnesses whom are unknown at this time.

### 13 DOCUMENTS

14 All documents, including electronic mailings and websites, that show the actual  
 15 facts regarding the conduct of Defendants that is material and relevant to disproving the  
 16 allegations of Plaintiff and proving the defenses of Defendant, after Defendants learn what  
 17 if any facts Plaintiff relies upon in support of its claims. Defendants anticipate that  
 18 documents, currently unknown, will become known through discovery and will be relied  
 19 upon by Defendants.

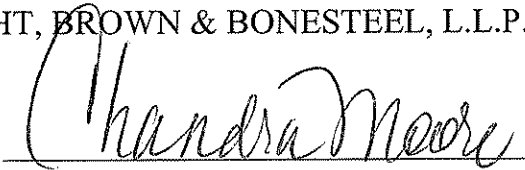
### 20 DAMAGES

21 Not applicable to Defendants at this time.

22 Dated: September 11, 2008

HAIGHT, BROWN & BONESTEEL, L.L.P.

24 By:

  
 Morton G. Rosen  
 Chandra Moore  
 Attorneys for Defendants  
 SONNY J. JOSLIN, ERIC JAMES  
 TINGEY, and DECOR A DOOR &  
 WINDOW, INC.

**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
COUNTY OF LOS ANGELES ) ss:

*MASTERPIECE LEADED WINDOWS CORPORATION vs. SONNY J. JOSLIN*  
*08 CV 765 JM/JMA*

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 550 West C Street, Suite 1760, San Diego, CA 92101.

On September 11, 2008, I served the within document described as:

**DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)**

on the interested parties in this action as stated below:

Gastone Bebi, Esq.  
444 West "C" Street, Suite 400  
San Diego, CA 92101

Tel: (619) 374-0514  
Fax: (619) 374-1985

☒ (BY ELECTRONIC SERVICE) through the Case Management/Electronic Court Filing system of the United States District Court, Southern District of California.

Executed on September 11, 2008, at San Diego, California.

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction the service was made and that the foregoing is true and correct.

Linda Gage Pomerinke  
(Type or print name)

  
(Signature)